

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.,

Case No. 4:20-cv-05640-YGR-TSH

Plaintiffs and Counter-
Defendants,

[PROPOSED] ORDER RE: APPLE
INC.'S ADMINISTRATIVE MOTION
TO SEAL

V.

APPLE, INC.,

The Honorable Yvonne Gonzalez Rogers
Courtroom 1, 4th Floor

Defendant and Counter- Plaintiff.

1 Pursuant to Federal Rule of Civil Procedure 26(c) and Civil Local Rule 79-5,
 2 Apple Inc. (“Apple”) has filed an Administrative Motion to Seal (the “Motion”). In
 3 support, Apple filed the accompanying declaration of Mark A. Perry.
 4

5 Having considered the Motion, all associated declarations, exhibits, and any
 6 argument of counsel, and for good cause appearing:
 7

8 **IT IS HEREBY ORDERED** that Apple’s request, consistent with the
 9 designations in the Administrative Motion, is **GRANTED**.

10 Accordingly,

11 (1) The public shall only have access to the version of the partially sealed
 12 documents sought to be sealed by the Motion in which portions of these documents
 13 have been redacted for the reasons set forth below:
 14

16 Portion of Document 17 Sought to be Sealed	18 Document Title	19 Reason to Seal
20 Highlighted 21 information on pages 5 22 and 10-11.	23 Apple Inc.’s Response to Order 24 Regarding Discovery Sanctions 25 [Dkt. 1171]	26 Attorney-client privilege and 27 work-product doctrine
28 Highlighted 29 information in 30 paragraphs 37, 44, 52, 31 53, 54, 92, and 93.	32 Declaration of Mark A. Perry in 33 Support of Apple Inc.’s Response to 34 Order Regarding Discovery Sanctions 35 [Dkt. 1171]	36 Attorney-client privilege and 37 work-product doctrine
38 Entire document	39 Ex. A (Outside counsel’s privilege- 40 specific review protocol provided to 41 Deloitte)	42 Attorney-client privilege and 43 work-product doctrine
44 Entire document	45 Ex. B (Outside counsel’s general 46 review protocol provided to Deloitte)	47 Attorney-client privilege and 48 work-product doctrine
49 Entire document	50 Ex. C (Outside counsel quality control 51 review protocol)	52 Attorney-client privilege and 53 work-product doctrine

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Portion of Document Sought to be Sealed	Document Title	Reason to Seal
	Entire document	Ex. D (Apple's company-wide privilege training)	Attorney-client privilege and work-product doctrine
	Entire document	Ex. K (Outside counsel re-review protocol)	Attorney-client privilege and work-product doctrine

IT IS SO ORDERED.

Dated: _____, 2025

The Honorable Yvonne Gonzalez
Rogers
United States District Court Judge